REMARKS

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated January 30, 2009 and Advisory Action dated May 13, 2009 have been received and their contents carefully reviewed.

Claims 1, 12, and 13 are hereby amended to clarify the scope of the claims. No new matter was added. Accordingly, claims 1-13 are currently pending. Reexamination and reconsideration of the pending claims is respectfully requested.

The Office rejects claims 1-6, 8, 9, and 11-13 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2004/0203909 to Koster *et al.* (hereinafter "*Koster*") in view of U.S. Patent Publication No. 2006/0142935 to Koerber *et al.* (hereinafter "*Koerber*"). *Office Action* at p. 2, ¶ 3. Applicants respectfully traverse the rejection.

Independent claim 1 is allowable in that it recites, among other features, "using a first communication object, located at a first location, to acquire data provided by a user, wherein said data comprises a parameter identifying said first location associated with an item of information, wherein said first location belongs to a set of locations identified in a unique manner in a system of reference; storing said data … in a service platform; using at least a second communication object located at a second location, belonging to said set of locations, to retrieve, from said service platform, at least said stored item of information associated with said first location."

Independent claim 12 is allowable in that it recites, among other features, "a first communication object, located at a first location, comprising means for acquiring data provided by a user, wherein said data comprises a parameter identifying said first location associated with an item of information, wherein said first location belongs to a set of locations identified in a unique manner in a system of reference; means for storing said data comprising an item of information and a parameter indicating said first location associated with said item of information in a service platform; and a second communication object, located at a second location belonging to said set of locations, comprising means for delivering, from said service platform, at least said stored item of information associated with said first location to a user."

Independent claim 13 is allowable in that it recites, among other features, "means for acquiring and storing data comprising an item of information, provided by a user via a communicating object situated in a first location and comprising a parameter indicating an identification of said first location associated with said item of information, said first location belonging to a set of locations identified in a unique manner in a system of reference; means for delivering at least said stored item of information associated with said first location to a user by way of at least one communicating object able to deliver information and situated in a second location belonging to said set of locations, wherein the platform comprises means specifically for matching up the location identification in the system of reference of one of the two information management systems with the location identification in the system of reference of the other of the two information management systems."

Applicants submit that *Koster* and *Koerber*, either alone or in combination, fail to teach or suggest, at least these features of the claimed invention.

Koster discloses a method of accessing location dependent information with a mobile telephone. *Koster* at FIG. 10A. When approaching a specific location, such as a restaurant 1012 for instance, a user initiates a generic location dependent request by sending his coordinates to a network via the mobile phone. *See id.* Based on these coordinates, the network will search for the nearest location having an information script, and when found, will download the information to the user. *Koster* at ¶ 0106 & FIG. 10A. The network communicates with an Information Service Provider (ISP) to obtain the locations of various items or businesses (e.g., the restaurant location). *Koster* at ¶ 0054. However, the ISP merely receives external inputs as necessary to formulate the information as appropriate (e.g., a map with the appropriate business locations). *Koster* at ¶ 0054. Thus, when the ISP (or navigation database) acquires, stores, or updates information about various locations or maps, the ISP does not take into account the location from which the information or map is being input. *Koster* at ¶ 0054. Hence, *Koster* is merely concerned with populating a navigation database, and does not teach or suggest, at least, "a parameter identifying said first location associated with an item of information, wherein said first location belongs to a set of locations identified in a unique manner in a system of reference; [and] storing said data...in a service platform."

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Furthermore, the system described by *Koster* is limited to a one-location-at-a-time operation. *See Koster* at ¶ 0106. *Koster* fails to disclose that even one stored item of information acquired by a first user and associated with a first location can be delivered to another user situated at a second location by way of a communication object at the second location. For example, in *Koster's* FIG. 10A, the user located in the restaurant cannot have access to or modify the data related to the Locksmith shop due at least to the user's proximity to the restaurant. *Koster* at ¶ 0106 & FIG. 10A. Thus, for arguments sake, assuming that the locksmith shop is considered to be the first location described in claim 1, when the user is located in the restaurant or second location, *Koster* is entirely silent as to the limitation of claim 1 which requires "using at least a second communication object <u>located at a second location</u> [the restaurant] belonging to said set of locations <u>to retrieve</u>, from said service platform, at least said <u>stored item of information associated with</u> said <u>first location</u> [the locksmith shop]," as recited in claim 1. (Emphasis added).

In fact, the Office appears to admit that *Koster* fails to teach or suggest the above-recited elements of claim 1, by stating: "*Koerber* discloses what *Koster* does not expressly disclose"; and then going on to assert that *Koerber* teaches the acquiring … storing … and delivering features of claim 1.

Applicants assert, however, that *Koerber* fails to cure the deficiencies of *Koster*. *Koerber* discloses a system for providing a user with location based information. When in a first location, for instance a shop A in a mall, a user device can provide information related either to the shop A (a price-list for example), or to another shop B in the mall. The latter can be done by pointing the user device at shop B, for instance. Such a system is not interactive, in the sense that the user is only allowed to access predefined information relating to some shops and stored in a database, without being able to upload or store his own information in said database.

The Office asserts that *Koerber* discloses the elements of the claimed invention, citing to paragraphs 0026-0028 of *Koerber*. *Office Action* at p. 3. Applicants respectfully disagree. The cited portions of *Koerber* describe that a navigation database may be arranged to store the location identification data associated with a particular physical location. *Koerber* does not indicate, either in paragraphs 0026-0028, or any other passage, that data is acquired by a user of the system and stored in a service platform. Actually, in *Koerber*, the only interaction that the

user may have with the system is limited to sending a query (to a remote database for instance) in order to retrieve location-based information. As further proof, in paragraph 0038 of *Koerber*, only the possibility of downloading data is mentioned, not the possibility of a user uploading data or "storing said data…in a service platform." Hence, *Koerber* merely teaches the possibility of downloading data from a navigation and/or information database, not the possibility of "storing said data … in a service platform," and "wherein said data comprises a parameter identifying said first location associated with an item of information." *Koerber* at ¶ 0038.

In fact, *Koerber* discloses that if no information pertaining to a location is stored in the information database, a search for said information using other data storage can be realized. *Koerber* at ¶ 0039. In such a case, *Koerber* entirely fails to consider that the user could store "said data…in a service platform," to correct this lack of information. *See id.*

In contrast to the interactively limited system of *Koerber*, the present invention endeavors to allow "the consultation and the composition of information with reference to a location." As-filed specification at p. 9, lines 15-18. For purposes of illustration only, the specification provides an example, which concerns a shopping list, to show an interactive aspect of the present invention. In that example, a user first defines his shopping list in his own kitchen (corresponding, for arguments sake, to the element of acquiring data), in order to store the data in a service platform (corresponding, for arguments sake, to the element of storing). *See id.* at p. 5, lines 8-25. The user can then have this shopping-list delivered to a user device situated in a second location, for instance a supermarket (corresponding, for arguments sake, to the element of delivering). *See id.* at p. 8, lines 3-10.

However, *Koerber* discloses that a user can retrieve location-based information from a location 130 from a location 'A', without indicating how this location-based information was acquired and stored beforehand in a database. *Koerber* at ¶¶ 0016-0018 & FIG. 1. In fact, *Koerber* may even be said to teach away from delivering information that was <u>acquired and stored previously</u> by a user, because *Koerber* cites only examples, such as a shopping-list, where a user cannot interact at all with the acquisition of the information. *See id.*

Thus, since *Koerber* only deals with passive reception of information in a single location, for instance in a restaurant, *Koerber* does not teach or suggest, at least, "using a first

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communication object located at a first location to acquire data provided by a user, wherein said data comprises a parameter identifying said first location associated with an item of information, wherein said first location belongs to a set of locations identified in a unique manner in a system of reference; storing said data…in a service platform; using at least a second communication object located at a second location belonging to said set of locations to retrieve, from said service platform, at least said stored item of information associated with said first location," as recited in claim 1, "a first communication object, located at a first location, comprising means for acquiring data provided by a user, wherein said data comprises a parameter identifying said first location associated with an item of information, wherein said first location belongs to a set of locations identified in a unique manner in a system of reference; means for storing said data comprising an item of information and a parameter indicating said first location associated with said item of information in a service platform; and a second communication object, located at a second location belonging to said set of locations, comprising means for delivering, from said service platform, at least said stored item of information associated with said first location to a user," as recited in claim 12, and "means for acquiring and storing data comprising an item of information, provided by a user via a communicating object situated in a first location and comprising a parameter indicating an identification of said first location associated with said item of information, said first location belonging to a set of locations identified in a unique manner in a system of reference; means for delivering at least said stored item of information associated with said first location to a user by way of at least one communicating object able to deliver information and situated in a second location belonging to said set of locations, wherein the platform comprises means specifically for matching up the location identification in the system of reference of one of the two information management systems with the location identification in the system of reference of the other of the two information management systems," as recited in claim 13.

Accordingly, Applicants respectfully submit that independent claims 1, 12, and 13 are patentably distinguishable over the combined teachings of *Koster* and *Koerber*. It stands to reason that claims 2-6, 8, 9, and 11, which depend from claim 1, are also patentably distinguishable for at least the same reasons. Therefore, Applicants respectfully request the Office to withdraw the 35 U.S.C. § 103(a) rejection of claims 1-6, 8, 9, and 11-13.

The Office rejects claims 7 and 10 under 35 U.S.C. § 103(a) as being unpatentable over *Koster* in view of *Koerber* in further view of U.S. Patent Publication No. 2003/0187949 to Bhatt *et al.* (hereinafter "*Bhatt*"). *Office Action* at p. 8, ¶ 4. Applicants respectfully traverse the rejection.

As discussed above, neither *Koster*, nor *Koerber*, individually or in combination, disclose or suggest all the features of independent claim 1, from which claims 7 and 10 ultimately depend. *Bhatt* fails to cure the deficiencies of *Koster* and *Koerber*. In fact, *Bhatt* is merely cited for a purported teaching of an, "authentication process." *Office Action* at p 9. Thus, claims 7 and 10 are at least allowable by virtue of their dependencies from independent claim 1. Accordingly, Applicants respectfully request the Office to withdraw the 35 U.S.C. § 103(a) rejection of claims 7 and 10.
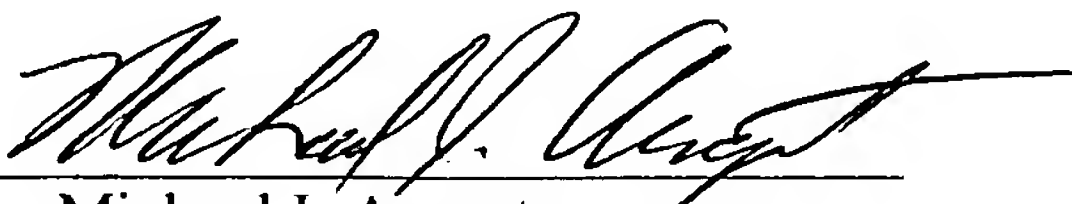
CONCLUSION

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911.

Dated: June 1, 2009

Respectfully submitted,

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